

ILLINOIS INDEPENDENT TAX TRIBUNAL
CHICAGO, ILLINOIS

JAMAL CHAUDHARY,)	
)	
Petitioner,)	
v.)	14-TT-183
ILLINOIS DEPARTMENT OF REVENUE,)	
Respondent.)	

NOTICE OF FILING
CERTIFICATE OF SERVICE VIA EMAIL

To: Akram Zanayed
Akram Zanayed & Associates
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Email: Zanavedlaw@gmail.com

PLEASE TAKE NOTICE that on March 10, 2016, the Respondent, Department of Revenue of the State of Illinois, filed with the Illinois Independent Tax Tribunal, 160 N. LaSalle Street, Room N506, Chicago, Illinois 60601, the Fifth Joint Motion for Extension of the Proposed Final Pretrial Order and the Final Pretrial Conference, a copy of which is attached and served upon you via email, prior to the hour of 5:00 p.m.

Respectfully submitted,

Lisa Madigan, Attorney General
State of Illinois

Date: March 10, 2016

By:



Daniel A. Edelstein
Special Assistant Attorney General

**ILLINOIS INDEPENDENT TAX TRIBUNAL
CHICAGO, ILLINOIS**

JAMAL CHAUDHARY,)	
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ILLINOIS DEPARTMENT OF REVENUE,)	
Respondent.)	

**FIFTH JOINT MOTION FOR EXTENSION OF THE PROPOSED FINAL
PRETRIAL ORDER AND THE FINAL PRETRIAL CONFERENCE**

NOW COMES the Department of Revenue of the State of Illinois (“Respondent”), through its attorney, Lisa Madigan, Attorney General of and for the State of Illinois, and Jamal Chaudhary (“Petitioner”), through his attorneys, Akram Zanayed and Associates, and respectfully move this Tribunal for a fifth extension of the due date of the Proposed Final Pretrial Order, and of the date of the Final Pretrial Conference. In support thereof Respondent and Petitioner (the “Parties”) state as follows:

1. Pursuant to the last Order entered in this case, the Parties have until March 10, 2016 to prepare and submit a proposed final pretrial order, and the final pretrial conference is set for March 23.
2. On November 30, 2015, Petitioner’s counsel provided a draft of the proposed order, which did not include statements of uncontested facts and points of law or “copies of documents which will be offered into evidence at the hearing.” Standing Pretrial Order, § 2.(a).
3. In the succeeding months, counsel for the Parties worked to significantly reduce the number of facts and issues which will be contested at hearing, and as of January 22, 2016 determined that the contested facts and issues were capable of further reduction.
4. The resulting potential reductions to Petitioner’s alleged liability at issue, the Parties believed, might allow this matter to be settled without the necessity of a hearing.
5. In that vein, Petitioner’s counsel made a new settlement offer on January 22.
6. However, Respondent’s Audit Bureau proposed that such offer be rejected, and Respondent’s counsel made a formal rejection of such offer on March 9.
7. Believing that settlement was no longer possible, on March 9 Respondent’s counsel also provided a revised draft of the proposed order, including statements

- of uncontested facts and points of law. and "copies of documents which [the Department] will offer into evidence." Standing Pretrial Order. § 2.(a).
8. Petitioner's counsel requires additional time to review such revised draft. and to provide "copies of documents which [Petitioner] will offer into evidence." *Id.*
 9. Counsel for the Parties have conferred and both agreed to bring this Fifth Motion.
 10. This request is made for good cause and in good faith. and will not prejudice either party.

WHEREFORE, the Parties respectfully move this Tribunal for a fifth extension of the due date of the Proposed Final Pretrial Order. to March 21, 2016, a fifth extension of the Final Pretrial Conference. to the week of April 4, 2016. and for any other relief that is just.

Respectfully submitted,

Lisa Madigan, Attorney General
State of Illinois
Respondent

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Jamal Chaudhary
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